

LAW OFFICES  
LEVENTHAL, SENTER & LERMAN  
SUITE 600

2000 K STREET, N.W.  
WASHINGTON, D.C. 20006-1809

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TELEPHONE  
(202) 429-8970

TELECOPIER  
(202) 293-7783

TELEX  
822-9260 NPL WSH

OF COUNSEL  
TOBEY B. MARZOUK

ORIGINAL  
FILE

NORMAN P. LEVENTHAL  
MEREDITH S. SENTER, JR.  
STEVEN ALMAN LERMAN  
RAUL R. RODRIGUEZ  
DENNIS P. CORBETT  
BARBARA K. GARDNER  
STEPHEN D. BARUCH  
SALLY A. BUCKMAN  
LAURA B. HUMPHRIES  
EVAN D. CARB  
LYNN M. CRAKES  
DAVID S. KEIR\*

November 13, 1992

\* ADMITTED VA ONLY

**VIA HAND DELIVERY**

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: MM Docket No. 92-211

Dear Ms. Searcy:

On behalf of Franklin Communications Partners, L.P., licensee of FM Broadcast Station WKSJ-FM, Mobile, Alabama, I am transmitting, pursuant to Rule 1.420, an original and four copies of its Comments in response to the September 22, 1992 Notice of Proposed Rule Making in the above-referenced proceeding.

If you should have any questions concerning this matter, kindly communicate with the undersigned.

Very truly yours,

*Laura B. Humphries*  
Laura B. Humphries

Enclosures  
LBH/kam

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 92-211  
RM-8601

**COMMENTS OF FRANKLIN COMMUNICATIONS PARTNERS, L.P.**

In the Notice of Proposed Rule Making, DA 92-1166 (released September 22, 1992) (the "Notice"), in this proceeding, the Commission proposed to substitute Channel 237C1 for Channel 237C2 at Lumberton, Mississippi and to modify the license of Station WLUN to specify operation on the higher class channel.<sup>2/</sup> In the Notice, the Commission noted that Stone-Lamar's site for

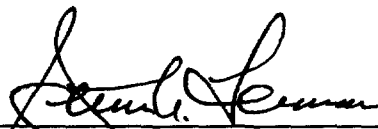
2/ The Commission's proposed change to the Table of Allotments was requested by Stone-Lamar Broadcast Services Corporation ("Stone-Lamar"), licensee of WLUN.

its proposed Class C1 facility would be short-spaced to the "allotment site" for WKSJ-FM, which operates on second adjacent Channel 235C. The Commission further noted that WKSJ-FM has outstanding a construction permit (File No. BMPH-900427ID) to which the Lumberton Class C1 facility would be fully spaced.

WKSJ-FM is currently operating from the site specified in the above-referenced construction permit and has on file with the Commission an application for license to cover that permit (File No. BLH-910214KC). Franklin has no objection to the proposed WLUN upgrade, so long as WKSJ-FM is afforded full interference protection at its existing site. Franklin is aware of the Commission's long-standing policy of refusing to create short-spaced allotments, see, e.g., Notice of Proposed Rule Making in MM Docket No. 87-121, 3 FCC Rcd 1820, 1821 and n.9 (1988), and respectfully requests the agency to faithfully adhere to that policy in this instance.

Respectfully submitted,

FRANKLIN COMMUNICATIONS  
PARTNERS, L.P.

By   
Steven A. Lerman

By   
Laura B. Humphries

Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Its Attorneys

November 13, 1992

CERTIFICATE OF SERVICE

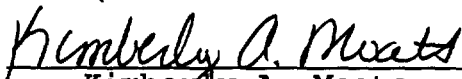
I, Kimberly A. Moats, hereby certify that the foregoing  
"Comments of Franklin Communications Partners, L.P." were served  
by first-class mail, postage prepaid, this 13th day of November,  
1992 on the following persons:

\*Michael C. Ruger  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
Room 8318  
Washington, D.C. 20554

\*Kathleen Scheuerle  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
Room 8314  
Washington, D.C. 20554

Griffin Broadcasting Corporation  
832 Partridge Lane  
Albany, Georgia 31707

John S. Neely, Esq.  
Miller & Miller, P.C.  
P.O. Box 33003  
Washington, D.C. 20033

  
Kimberly A. Moats